



March 23, 2020

The Honorable Jerrold N. Poslusny, Jr.
United States Bankruptcy Court
PO Box 2067
Camden NJ 08102

Re: Jeffrey B. Martin
Case # 20-13637 (JNP)
Hearing Date March 24, 2020

Dear Judge Poslusny:

Please accept this letter in lieu of a more formal response to the Trustee's letter dated March 23, 2020 asking that the sale be approved and that the proceeds in dispute be held in trust to allow trustee additional time to review. I do not oppose the trustee's request as long as the non-debtor spouse can receive her half of the proceeds at closing. The debtors half, in its entirety, will be held in trust pending further order of the court.

We will submit a revised proposed form of order which will include this language as well as language authorizing the Chapter 13 trustee and the debtor to sign on the deed.

Respectfully Submitted

/s/Robert N. Braverman

Robert N. Braverman
McDowell Law, PC